

STATE OF INDIANA      )  
                            )  
COUNTY OF LAKE      ) SS:  
                            )  
CHRISTIAN BALDERAS,    )  
                            )  
PLAINTIFF,              )  
                            )  
VS.                      )  
                            )  
TARGET CORPORATION,    )  
                            )  
DEFENDANT.              )

IN THE LAKE SUPERIOR COURT

CAUSE NO.:

45D101705C10089

Filed in Clerk's Office

MAY 03 2017

*Michael A. Brown*  
CLERK LAKE CIRCUIT COURT

**COMPLAINT FOR DAMAGES**

COMES NOW the Plaintiff, Christian Balderas, by undersigned counsel, and for his Complaint for Damages against Defendant Target Corporation, does allege and state the following:

**PARTIES**

1. Plaintiff Christian Balderas (hereinafter referred to as "Plaintiff") is a resident of Lake County, Indiana.

2. Defendant Target Corporation (hereinafter referred to as "Defendant") upon information and belief is now, and at all times mentioned in this complaint was, a foreign for-profit corporation with its principal office located at 1000 Nicollet Mall, TPS 3155, Minneapolis, Minnesota, and with its Munster, Indiana store location at 8005 Calumet Avenue in Munster, Indiana.

**JURISDICTION AND VENUE**

3. This court has jurisdiction over this matter pursuant to Indiana Trial Rule 75. All events occurred in Lake County, Indiana.

EXHIBIT

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**FACTS COMMON TO ALL COUNTS**

4. On March 18<sup>th</sup>, 2016, Plaintiff was an invitee at Defendant's shopping facility located at 8005 Calumet Avenue in Munster, Indiana.
5. While at Defendant's facility, Plaintiff walked down an aisle towards the back of the store.
6. While walking down the store aisle, Plaintiff slipped on food on the floor.
7. Plaintiff sustained injuries and damages as a direct result of this incident.

**COUNT I: NEGLIGENCE-PREMISE LIABILITY**

8. Plaintiff restates and affirms paragraphs one (1) through seven (7) above, as if the same were wholly set out herein.
9. Defendant had a duty to observe reasonable care and maintain safe conditions for its invitees.
10. Defendant knew, or should have known, that a condition existed that created an unreasonable danger to invitees.
11. Defendant should have expected that invitees would not discover or realize the danger, or would fail to protect against the danger.
12. Defendant breached its duty to observe reasonable care.
13. Defendant breached its duty to maintain safe conditions.
14. As a direct and proximate result of Defendant's breaches of duty, Plaintiff has suffered physical, emotional, and pecuniary injuries and damages.

**PLAINTIFF'S REQUEST FOR RELIEF**

WHEREFORE, Plaintiff, by counsel, respectfully requests that this Honorable Court award him damages in an amount to be determined at jury trial and sufficient to compensate him

for the damages he suffered as a result of Defendant's actions and inactions, and for all other relief just and proper.

Respectfully submitted,

ALEX MENDOZA LAW, LLC



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Attorneys for the Plaintiff

**PLAINTIFF'S REQUEST FOR TRIAL BY JURY**

COMES NOW the Plaintiff, by counsel, and respectfully requests that the Court set this matter for trial by jury.

Respectfully submitted,

ALEX MENDOZA LAW, LLC



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